

MICHAEL R. PONTONI, ESQ., LL.M.
Nevada Bar No. 4030
64 N. Pecos Road, Suite 100
Henderson, Nevada 89074
(702) 374-8369 Telephone
pontonioffice@lvcoxmail.com
ATTORNEY FOR DEFENDANT
LL BRADFORD AND COMPANY LLC

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

* * * *

KENNETH LANE, *et. al.*; individually and on
behalf of a class of similarly situated persons,

Plaintiffs,

vs.

CONESTOGA SETTLEMENT SERVICES,
LLC; CONESTOGA INTERNATIONAL
LLC; CONESTOGA TRUST SERVICES,
LLC; L.L. BRADFORD AND COMPANY,
LLC (sic); STRATEGIX SOLUTIONS, LTD.,
MICHAEL McDERMOTT; and JAMES
SETTLEMENT SERVICES, LLC,

Defendants.

CASE NO.: 2:20-cv-01716-APG-BNW

**STIPULATION AND [PROPOSED]
ORDER ENLARGING TIME FOR
DEFENDANT LL BRADFORD AND
COMPANY LLC TO ANSWER OR
OTHERWISE PLEAD.**

Defendant LL Bradford and Company LLC, by and through its counsel of record, Michael
R. Pontoni, Esq., LL.M. ("LL Bradford") and plaintiffs herein represented by their attorneys

1 Reese Marketos LLP and King & Durham, PLLC (“plaintiffs”) hereby stipulate to enlarge the
2 time by which LL Bradford must respond to the Complaint up to and including **February 1, 2021**.

3 This Stipulation is made and based upon the following:

- 4
- 5 1. Plaintiffs filed their Complaint on September 17, 2020. Therein they allege defendants
- 6 engaged in misconduct including malfeasance that caused money damages to plaintiffs.
- 7 *ECF No. 1*. Plaintiffs seek certification to represent a class of similarly situated individuals
- 8 across the country. *Ibid*.
- 9
- 10 2. Plaintiff’s service agent asserts LL Bradford was served with the Complaint on or about
- 11 October 30, 2020; LL Bradford’s response was ostensibly due on or before November 21,
- 12 2020.
- 13
- 14 3. Counsel for LL Bradford represents that the has recently been engaged and requires
- 15 additional time to evaluate plaintiffs’ allegations and prepare a response, taking into
- 16 account the exercise of due diligence.
- 17
- 18 4. In light of the foregoing, these parties agree and request that LL Bradford shall have up to,
- 19 and including, **February 1, 2021**, to respond to the Complaint.
- 20
- 21
- 22
- 23 \ \ \
- 24
- 25
- 26
- 27
- 28 \ \ \

5. LL Bradford thus requests that the Court accept this stipulation and enter this proposed order. This is LL Bradford's first request for an extension of time. This Stipulation is entered into in good faith and not for purposes of delay.

DATED this 15th day of January

2021. Michael R. Pontoni, Esq.,

LL.M.

/s/ Michael R. Pontoni

*Attorneys for Defendant LL
Bradford and Company,
LLC*

DATED this 15th day of January

2021. REESE MARKETOS LLP

/s/ Brett S. Rosenthal

Adam Sanderson, Esq.
Brett S. Rosenthal, Esq.

Gregory H. King, Esq.
Matthew Durham, Esq.
KING & DURHAM PLLC

Attorneys for Plaintiffs

ORDER

IT IS SO ORDERED

DATED: 12:07 pm, January 20, 2021



**BRENDA WEKSLER
UNITED STATES MAGISTRATE JUDGE**